Section I: General Measures to Deter Bribery

Question 2:

Do you encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery?		If yes: a) Please indicate how this is accomplished:		Elaboration for "other" answers and/or any additional comments/clarifications:
Australia	Yes, always	text in the application form		
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)	X	
		other		
Austria	Yes, always	text in the application form		
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other		
Belgium	Yes, always	text in the application form		If an exporter has been convicted, the due diligence procedure foresee to control if management control systems has been taken.
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other		
Canada	Yes, always	text in the application form		
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)	X	
		other		
Czech Republic (EGAP)	Yes, always	text in the application form		
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)	X	
		other		
Czech Republic (CEB)	Yes, always	text in the application form		
		a stand-alone document is provided to applicants		
		text in the general conditions of cover	X	
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other		

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Section I: General Measures to Deter Bribery

Question 2:

Do you encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery?		If yes: a) Please indicate how this is accomplished:		Elaboration for "other" answers and/or any additional comments/clarifications:
Denmark	Yes, always	text in the application form		Text included in declarations of non-bribery to be submitted by applicants/exporters.(In case of LC's with credit periods up to 12 months we only require declarations from the guarantee holder, not from the exporter.) Information provided to customers in EKF's newsmail June 2007.
		a stand-alone document is provided to applicants	X	
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other	X	
Finland	Yes, always	text in the application form		Text included in a stand-alone document submitted by applicant and exporter. FEC's internet site contains a direct link to Finnvera's bribery information.
		a stand-alone document is provided to applicants	X	
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other		
France	Yes, always	text in the application form	X	Circulaire aux assurés
		a stand-alone document is provided to applicants		
		text in the general conditions of cover	X	
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other	X	
Germany	Yes, always	text in the application form		
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)	X	
		other		
Greece	Yes, always	text in the application form	X	
		a stand-alone document is provided to applicants		
		text in the general conditions of cover	X	
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other		

Section I: General Measures to Deter Bribery

Question 2:

Do you encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery?		If yes: a) Please indicate how this is accomplished:		Elaboration for "other" answers and/or any additional comments/clarifications:
Hungary (MEHIB)	Yes, always	text in the application form	X	Sales manager of MEHIB and Eximbank are obliged to suggest that the client should develop, apply and document appropriate management control systems that combat bribery. Sales manager's obligatory communication is subject to in-house regulation. In the practice the above mentioned communication means a verbal raising awareness process associating with the application- form package the client is documented with. This package contains the text of the relevant provisions of the national Penalty Code, and the sales manager has to direct the client's attention to the fact that i) he/she is subject to the anti- bribery provisions and suggest that anti- bribery control system should be applied; ii) the ECA reserves the right to check the applicant's anti- bribery control system in the course of any due diligence procedure, when appropriate.
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other	X	
Hungary (Eximbank)	Yes, always	text in the application form	X	Sales manager of MEHIB and Eximbank are obliged to suggest that the client should develop, apply and document appropriate management control systems that combat bribery. Sales manager's obligatory communication is subject to in-house regulation. In the practice the above mentioned communication means a verbal raising awareness process associating with the application- form package the client is documented with. This package contains the text of the relevant provisions of the national Penalty Code, and the sales manager has to direct the client's attention to the fact that i) he/she is subject to the anti- bribery provisions and suggest that anti- bribery control system should be applied; ii) the ECA reserves the right to check the applicant's anti- bribery control system in the course of any due diligence procedure, when appropriate.
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other	X	

Section I: General Measures to Deter Bribery

Question 2:

Do you encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery?		If yes: a) Please indicate how this is accomplished:		Elaboration for "other" answers and/or any additional comments/clarifications:
Italy	Yes, always	text in the application form	X	
		a stand-alone document is provided to applicants		
		text in the general conditions of cover	X	
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other		
Japan (JBIC)	Yes, always	text in the application form		Oral communication.
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other	X	
Japan (NEXI)	Yes, always	text in the application form		If necessary, we explain it orally at the meeting of with the exporters.
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)	X	
		other	X	
Korea (Eximbank)	Yes, always	text in the application form	X	
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other		
Korea (K-sure)	Yes, always	text in the application form		text in a stand-alone document of application to K-sure
		a stand-alone document is provided to applicants	X	
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other	X	
Luxembourg	Yes, always	text in the application form		ODL supports, whenever possible, any action of the exporter to apply appropriate management control systems to combat bribery.
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other	X	
Mexico	Yes, always	text in the application form		
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other		

Section I: General Measures to Deter Bribery

Question 2:

Do you encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery?		If yes: a) Please indicate how this is accomplished:		Elaboration for "other" answers and/or any additional comments/clarifications:
Netherlands	Yes, always	text in the application form	X	Atradius DSB does encourage development, application and documentation of appropriate control systems that combat bribery by way of promoting awareness on the issue by publications on the website and in the bi-monthly magazine.
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)	X	
		other		
New Zealand	Yes, always	text in the application form	X	
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)	X	
		other		
Norway	Yes, always	text in the application form	X	
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other		
Poland	Yes, always	text in the application form		
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other		
Portugal	Yes, always	text in the application form	X	Additional to the application form to be subscribed by the exporter under Buyer's credit Policies.
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other	X	
Slovak Republic	Yes, always	text in the application form	X	
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other		

Section I: General Measures to Deter Bribery

Question 2:

Do you encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery?		If yes: a) Please indicate how this is accomplished:		Elaboration for "other" answers and/or any additional comments/clarifications:
Spain	Yes, always	text in the application form		
		a stand-alone document is provided to applicants	X	
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other		
Sweden	Yes, always	text in the application form	X	Supplementary form for application for export credit guarantee in favour of lender (to be filled in by the exporter)
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other	X	
Switzerland	Yes, always	text in the application form		SERV is of the opinion that by having the exporters and/or banks sign our corruption prevention confirmation, we are implicitly encouraging the development and application of control systems.
		a stand-alone document is provided to applicants	X	
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other		
Turkey	Yes, always	text in the application form		The text is included in a stand-alone document submitted by applicants/exporters.
		a stand-alone document is provided to applicants	X	
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other		
United Kingdom	Yes, always	text in the application form	X	ECGD encourages applicants to develop, apply and document appropriate management control systems to combat bribery by asking in its product application forms, as per the above, whether applicants have a Code of Conduct in place to discourage corrupt activity.
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site		
		customer publications (e.g. brochures, handbooks)		
		other		

Section I: General Measures to Deter Bribery

Question 2:

Do you encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery?		If yes: a) Please indicate how this is accomplished:		Elaboration for "other" answers and/or any additional comments/clarifications:
United States (EXIM)	Yes, always	text in the application form		
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)	X	
		other		
United States (USDA)	Yes, always	text in the application form		A press release issued as a notice to program participants reminding exporters/applicants that they need to be familiar with the FCPA and other Anti-Bribery Measures.
		a stand-alone document is provided to applicants		
		text in the general conditions of cover		
		text in the credit agreement		
		information posted on the organisation's web site	X	
		customer publications (e.g. brochures, handbooks)		
		other	X	

Section I: Measures to Deter Bribery

Question 2 (continued):

b) Please provide the text used to encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery:	
Australia	Refer response/comments under Question 1b) and additional measures to Question 1.
Austria	A major aim of the Recommendation is to raise the awareness of combating bribery in international business transactions. In this regard, exporters/applicants are encouraged to apply appropriate management control systems to prevent bribery.
Belgium	This text will be on the website very soon. The text is being translated now. « II. CORRUPTION Les efforts des membres de l'OCDE en matière de lutte contre la corruption ont abouti en 2006 à l'adoption d'une nouvelle recommandation. Cette recommandation est le résultat de la révision et du renforcement de l'Action Statement qui était en vigueur pour les assureurs publics de crédits à l'exportation et découle de la Convention anti-corruption de l'OCDE conclue le 17 décembre 1997. Le formulaire de demande d'assurance a été renforcé et la due diligence a été traduite dans une procédure formelle. Ainsi, le formulaire de demande d'assurance informe l'assuré de la législation en vigueur. Celui-ci doit s'engager à respecter cette réglementation par le biais de la déclaration qui fait partie de la procédure de demande d'assurance. D'autre part l'assuré doit déclarer qu'il ne figure pas sur les listes d'exclusion de certaines institutions financières internationales et que lui-même et toute personne agissant pour son compte n'ont fait l'objet de poursuites ou de condamnations pour faits de corruption. Conformément à la procédure de due diligence, l'instructeur a le devoir d'examiner de plus près les demandes d'assurance impliquant des assurés qui ont été exclus pour faits de corruption par une institution financière internationale, qui font l'objet de poursuites ou qui ont été condamnés pour corruption dans le passé. Dans le cas où un assuré a été reconnu coupable de corruption au cours des cinq années précédant la demande, l'instructeur doit vérifier que des mesures correctrices et préventives internes ont été prises avant qu'un nouveau soutien puisse être accordé pour un crédit à l'exportation. L'instructeur vérifiera si l'exportateur/demandeur ne figure pas sur la liste d'éviction pour faits de corruption de la Banque Mondiale. L'instructeur examine tous les dossiers avec la même prudence, en ce compris les dossiers pour compte d'un autre assureur, quel qu'il soit. L'ONDD ne pourra octroyer de soutien pour une transaction s'il existe une preuve crédible de faits de corruption dans l'attribution du contrat d'exportation. Le Comité de direction et/ou le Conseil d'administration doivent rapporter les éléments ayant conduit à refuser une affaire pour preuves crédibles de faits de corruption aux autorités judiciaires. Par ailleurs, l'art. 12.5 de nos conditions générales stipule : « L'assuré est déchu de ses droits et contraint au remboursement de toute indemnité qui lui aurait été versée s'il est condamné par une décision de justice définitive, rendue sur base des dispositions pénales prises pour l'application de la convention OCDE de lutte contre la corruption d'agents publics étrangers dans les transactions internationales, signée à Paris le 17 décembre 1999. Les obligations de l'Office national du ducroire sont suspendues de plein droit en cas de poursuites judiciaires intentées contre l'assuré sur base des dispositions précitées. L'assuré est tenu de déclarer sans délai toute poursuite intentée ou toute condamnation pénale prononcée à son encontre ». »

Section I: Measures to Deter Bribery

Question 2 (continued):

b) Please provide the text used to encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery:	
Canada	How to Protect Your Business: Take proactive steps to minimize your risk: • Determine if your markets present a high risk of corruption; • Familiarize all employees with the Corruption of Foreign Public Officials Act; • Establish an anti-corruption policy that applies and documents appropriate management control systems that combat bribery; • Require employees and agents to periodically sign an agreement to comply with this anti-corruption policy; • Educate and train employees and agents on a regular basis about their responsibilities and appropriate actions to take if they encounter corruption; • Verify the credentials of agents and partners representing your company and monitor their efforts on your behalf; • Establish a reporting system for suspicious behaviour. A copy of EDC's brochure that we send to all customers is available at http://www.edc.ca/english/docs/anticorrupbrochure_june17_e.pdf
Czech Republic (EGAP)	EGAP recommends to exporters to adopt control measures lowering possibility of bribery in international transactions.
Czech Republic (CEB)	"Exporters (or applicants for state supported financing) must among other things demonstrate that they have developed and apply management control systems that combat bribery in accordance with the Czech legal system."
Denmark	EKF encourages all guarantee holders and exporters to develop, apply and document control systems that combat bribery.
Finland	Text in the stand-alone document: We understand the importance of the development, application and documentation of the appropriate anti-bribery management control systems. Text on Finnvera's website: The Official ECA shall encourage the exporter and the lender to develop, apply and document appropriate anti-bribery management control systems.
France	Circulaire aux assurés: Le 14 décembre 2006, le Conseil de l'OCDE soucieux de renforcer les mesures de prévention de la corruption a adopté une Recommandation, jointe en annexe, dont nous vous invitons à prendre connaissance. A ce titre, nous vous encourageons à mettre en place des dispositifs de prévention et de contrôle de lutte contre la corruption Formulaire de demande: Le demandeur déclare : "avoir pris connaissance des principes directeurs de l'OCDE à l'intention des entreprises multinationales opérant dans les pays ou originaires des pays qui ont adhéré à ces principes directeurs leur recommandant le respect de règles de bonne conduite dans le cadre de leurs activités commerciales internationales. avoir pris connaissance de la convention OCDE sur la lutte contre la corruption d'agents publics étrangers, de la Recommandation du 14 décembre 2006 sur la corruption et les crédits à l'exportation bénéficiant d'un soutien public ainsi que des articles 435-2 et suivants du code pénal relatifs à la lutte contre la corruption Conditions générales de promesses: Dans les cas visés au paragraphe 3 de la rubrique « LUTTE CONTRE LA CORRUPTION » de la demande d'assurance crédit (cf. ci-dessus) et au paragraphe 3 des déclarations relatives à la lutte contre la corruption jointes en annexe à la demande de garantie, la Compagnie pourra demander toute justification sur les mesures préventives et correctrices prises par l'exportateur et/ou la banque prêteuse.

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Section I: Measures to Deter Bribery

Question 2 (continued):

b) Please provide the text used to encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery:	
Germany	Prevention of bribery The damage caused by bribery not only poses a threat to the economic viability of the individual company but has also repercussions on the reputation of trade and industry as whole. The mutual trust between buyers and suppliers is destroyed. Intransparent and unlawful acts make fair competition impossible. Within this meaning the prevention of bribery is also risk control. In unison with the big German industrial associations such as BDI and BDA, the Federal Government therefore encourages export companies to actively take up the subject and to set up internal mechanisms designed to prevent corruption. Measures to prevent bribery comprise exemplary behaviour of the companies' managers and regular training of the employees in addition to drawing up a code of conduct. When looking for suitable preventive measures, above all the publications of BDI and Transparency International ("Self Audit") may be helpful. Additional, supplementary information on the subject of combating bribery can found under the following Web links. For full information please see our website – in English – at http://www.agaportal.de/en/aga/nachhaltigkeit/korruption.html
Greece	ECIO recommends the Exporters that apply for insurance policy coverage, to develop, apply and document that they have the appropriate control systems in order to combat bribery.
Hungary (MEHIB)	Upon the OECD Recommendation on bribery and officially supported export credits (2006), Eximbank / MEHIB encourages its clients to develop, apply and document appropriate management control systems that combat bribery. Measures to prevent bribery comprise in particular the following: • exemplary behaviour of the companies' managers, • regular training of the employees, • drawing up a code of conduct. See the full text of the Recommendation.
Hungary (Eximbank)	Upon the OECD Recommendation on bribery and officially supported export credits (2006), Eximbank / MEHIB encourages its clients to develop, apply and document appropriate management control systems that combat bribery. Measures to prevent bribery comprise in particular the following: • exemplary behaviour of the companies' managers, • regular training of the employees, • drawing up a code of conduct. See the full text of the Recommendation.
Italy	General Conditions of policy supplier / buyer credit insurance Art. 1 1.4 - In relation to the Insurance, the Insured Party expressly undertakes - insofar as applicable to such party - to fully comply with the Code of Ethics, which such party declares to be fully familiar with and approves in all its parts and which constitutes an integral and substantial part of this Policy. Main principles expressed in SACE's Code of Ethics are: legality, morality dignity. and equality. Code of Ethics is binding to employees, collaborators, company officers and every third parts with whom SACE deals, included policy holders. Any breach of principles included in the Code constitutes a breach of contract, with its legal consequences: through the inclusion of clauses referring to the Code, in each policy, SACE encourages the development and compliance of a management control system in policy holders companies. Furthermore in each policy application form, SACE encourages the development and compliance of a management control system in policy holders companies and requires the applicant / exporter to declare: "The Applicant is aware that, in order the insurance cover to be valid, the supply contract and the guarantee granted must comply with the rules of Italian and foreign law and in particular with the administrative and criminal provisions including the Legislative Decree 231/2001". The mentioned law establishes a specific criminal liability arising from specific crimes, including international bribery. The Company's liability shall be excluded whenever the company shall prove that it has implemented a "Organisational Model" (please see above question 1 b).
Japan (JBIC)	

Section I: Measures to Deter Bribery

Question 2 (continued):

b) Please provide the text used to encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery:	
Japan (NEXI)	Each company is expected to develop appropriate management control system that combat bribery in accordance with the 2006 Recommendation.
Korea (Eximbank)	"We undertake to develop, apply and document appropriate management control systems that combat bribery."
Korea (K-sure)	Text in a stand-alone document of application to K-sure : The applicant certifies «1. I have fully looked into the "Foreign Bribery Prevention Act" promulgated on December 28, 1998, duly observed what is stipulated in the law, and perceived the need to develop and implement a systematic internal management control systems that combat bribery.»
Luxembourg	
Mexico	Refer to the text under Question 1
Netherlands	Please refer to the text under Question 1b). In customer publications articles about anti-bribery initiatives are published on a case-by-case basis, but no specific standard text.
New Zealand	The NZECO encourages exporters and all applicants for NZECO products to develop, apply and document appropriate management control systems that combat bribery. The following text is included in the application pack and the NZECO's website: The NZECO supports initiatives by New Zealand exporters to have and apply internal policies to combat bribery and corruption. New Zealand exporters are encouraged to: 1. Develop and implement appropriate internal control systems that combat bribery and corruption. 2. Familiarise appropriate employees and agents with relevant New Zealand legislation. 3. Educate appropriate employees and agents about: • their responsibilities regarding combating bribery and corruption, • how to identify bribery and corruption, and • the actions to take if they encounter bribery and corruption 4. Identify the export markets that present a significant risk of bribery and corruption. 5. Establish a reporting system for suspicious behaviour. 6. Monitor the actions of agents representing your company.
Norway	The text is as follows: We understand the significance of developing, implementing and being able to document the existence of satisfactory control systems for fighting corruption.
Poland	KUKE S.A. encourages exporters and financing institutions to develop and apply management control systems, which would reflect transparency in their activity in relation to preventing bribery.
Portugal	The Applicant/Exporter recognises the importance of adopting suitable management control systems to combat bribery and accepts to answer in a truly, clear and precise manner to the following questions and accepts to answer in a truly, clear and precise manner to the followings questions 1. Are you listed on publicly available debarment lists of the following international financial institutions: World Bank Group, African Development Bank, Asian Development Bank European Bank for the Reconstruction and Development and the Inter-American Development Bank ? <<Yes, No>> 2. Does the applicant /exporter or any person acting on their behalf in connection with the transaction described under n.º 4 above, are currently under charge in a national court in connection with the violation of any legal provisions. <<Yes …..No>> 3. Does the applicant/exporter or anyone working for them in connection with the transaction described under n.º 4 above, have been convicted by a national court or within a five year period preceding the application have been subject to equivalent sanctions of administrative nature for violation of laws against bribery of foreign public officials? <<Yes ….. No>> In the affirmative, the applicant/exporter must present to COSEC evidence that appropriate internal corrective and preventive measures have been taken, maintained and documented.

Section I: Measures to Deter Bribery

Question 2 (continued):

b) Please provide the text used to encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery:	
Slovak Republic	Text in the enclosure to the application form submitted by the exporter, where appropriate by the applicant: - We declare that we are fully informed about the legal consequences of bribery in international business transactions under its national legal system including its national laws. We are aware, that the financing or the insurance with official export credit support cannot be provided in relation to the export contract, preparation or realization of which was connected with bribery directly or by means of the third person according to the special provisions of § 328 and foll. of the Law No.300/2005 Coll. – Criminal Law and § 49 of the Law No. 513/1991 Coll., Commercial Code. - We declare that during the preparation of the export contract we did not breach directly or by means of the third person Anti-Bribery provisions* and we will not breach them during the realization of the export contract. (*e.g. the Announcement of the Ministry of Foreign Affairs of the Slovak Republic No.318/1999 Coll. Convention on Combating Bribery of Foreign Public Officials in International Business Transactions). - We declare, that our company is not listed on the publicly available debarment lists of the following international financial institutions: World Bank Group, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development, Inter-American Development Bank. - We declare that our company or anyone acting on our behalf in connection with the transaction: is not currently under charge; within a five-year period preceding the application have not been convicted in a national court; have not been subject to equivalent national administrative measures for violation of laws against bribery of foreign public officials of any country. - We declare that our company discloses, upon demand of EXIMBANKA SR the identity of persons acting on our behalf in connection with the transaction, which is subject to state support, as well as the amount and purpose of commissions and fees paid, or agreed to be paid, to such persons.
Spain	We appreciate your collaboration and we encourage you to develop and apply appropriate management control systems that combat bribery, hoping that you share with us the opinion that combating bribery does not only correspond to Governments and Public Administration but to all members of Society.
Sweden	The OECD has agreed to a Recommendation on combating bribery. According to the Recommendation EKN and EKN's foreign equivalents shall obtain the following declaration from the company. Therefore we hereby declare that we acknowledge the importance of our development, application and documentation of the appropriate management control systems that combat bribery, that neither we, nor anyone acting on our behalf, in connection with the export transaction that the application refers to, have been engaged or will engage in bribery or other inappropriate reward for official duties to foreign ministers, members of parliament or public employees, that we are aware of the fact that EKN's responsibility for the guarantee may lapse, and that already received amounts of compensation – including interest thereon from the date of disbursement of such compensation – shall be repaid to EKN, if we, or anyone acting on our behalf, have been engaged or will engage in bribery or other inappropriate reward as mentioned above, also that we will indemnify EKN for all its costs and expenses which will be the consequences of the fact that we, or anyone acting on our behalf, have been engaged or will engage in bribery or other inappropriate reward as mentioned above. Note that, according to the Swedish criminal code 17:7 and 20:2, Swedish law penalizes bribery inter alia in the cases that have been described here.
Switzerland	See the text provided under Question 1b).

Section I: Measures to Deter Bribery

Question 2 (continued):

b) Please provide the text used to encourage exporters and, where appropriate, applicants, requesting official export credit support to develop, apply and document appropriate management control systems that combat bribery:	
Turkey	The self –declaration form article 5 reads: "We will take the necessary actions to develop, apply and document appropriate "management control system" within our company to combat bribery". Additionally, Article 6 of Turk Eximbank's "Directives on Combating Bribery of Foreign Public Officials in International Business Transctions" , which is an internal document, reads as: Should the companies, as the exporter of goods/services benefiting from support, whether or not they are the direct applicants, declare their noncompliance against the Articles 2 or 3 of the Undertaking at the time of the application, such application may be taken into consideration if; a. The bribing employee was dismissed, b. The Company has a well established "management control system", c. The Company agrees to have an independent audit carried out and to deliver these reports as the Bank may require, d. The Company agrees to take other measures as the Bank may require
United Kingdom	Does your company have a Code of Conduct and procedures in place to discourage and prevent Corrupt Activity (as defined in paragraph 4.6 of this Application)? □ Yes □ No If Yes: Is a copy of your latest code attached? □ Yes □ previously supplied (If not previously supplied, you must attach a copy) and Has it been and will it be applied to obtaining and performing the Supply Contract? □ No □ Yes □ Yes, but only from the date on which it came into force, namely _____ (specify date)
United States (EXIM)	Parties doing business with Ex-Im Bank are encouraged to develop, apply and document appropriate controls to combat bribery. More information about the FCPA, is available from the U.S. Department of Justice website, including, in particular, the Layperson's Guide to the FCPA Statute. For information on anti-corruption policies and public debarment lists of multilateral financial institutions, and the excluded parties list system (EPLS), please visit the following websites: www.worldbank.org www.iadb.org http://www.epls.gov www.adb.org www.ebrd.com
United States (USDA)	**Foreign Corrupt Practices Act (FCPA) and Other Anti-bribery Measures** Exporters are reminded that U.S. firms and individuals seeking to do business in foreign markets must be familiar with the Foreign Corrupt Practices Act of 1977 (FCPA), 15 U.S.C. §§ 78dd-1, et seq., which, in general, prohibits corrupt payments to foreign officials for the purpose of obtaining or keeping business. The anti-bribery provisions of the FCPA make it unlawful for a U.S. person, and certain foreign issuers of securities, to make a corrupt payment to a foreign official for the purpose of obtaining or retaining business for or with, or directing business to, any person. They also apply to foreign firms and persons who take any act in furtherance of such a corrupt payment while in the United States. Consistent with the FCPA, the Organization for Economic Cooperation and Development (OECD) has brought about anti-bribery recommendations to combat bribery of foreign public officials in international business transactions, which the U.S. Government has agreed to follow in its export credit practices. Congress enacted the FCPA to bring a halt to the bribery of foreign officials and to restore public confidence in the integrity of the American business system. Several firms that paid bribes to foreign officials have been the subject of criminal and civil enforcement actions, resulting in large fines and suspension and debarment from federal contracting, and their employees and officers have gone to jail. To avoid such consequences, many firms have implemented detailed compliance programs intended to prevent and to detect any improper payments by employees and agents. The Commodity Credit Corporation (CCC) reserves the right to require that exporters/applicants disclose, upon demand: (i) the identity of persons acting on their behalf in connection with the transaction, (ii) the amount and purpose of commissions and fees paid, or agreed to be paid, to such persons; and (iii) whether anyone acting on the exporter/applicant's behalf is charged with or has been convicted of any violations of law against bribery. In making certifications to CCC for application for a payment guarantee under GSM 102 as required by 7 C.F.R. 1493.50 and under the Facility Guarantee Program as required by 7 C.F.R. 1493.270 and in submitting an Evidence of Export notice as required by 7 C.F.R. 1493.90, the exporter/applicant is affirming that he/she is in compliance with the FCPA and other Anti-Bribery Measures. Parties doing business with CCC are encouraged to develop, apply and document appropriate controls to combat bribery. More information about the FCPA, is available from the U.S. Department of Justice website, including, in particular, the Layperson's Guide to the FCPA Statute. For information on anti-corruption policies and public debarment lists of multilateral financial institutions, and the excluded parties list system (EPLS), please visit the following websites: www.iadb.org, http://www.epls.gov, www.adb.org, www.ebrd.com

Section I: Measures to Deter Bribery

Question 2 (continued):

Please describe any additional measures taken in relation to exporter/applicant management control systems to combat bribery:	
Australia	
Austria	Exporters/banks and other stakeholders were informed about all elements of the recommendation in an awareness raising campaign starting with a workshop in January 2007.
Belgium	Access to the relevant documentation is required if necessary.
Canada	
Czech Republic (EGAP)	
Czech Republic (CEB)	
Denmark	
Finland	
France	
Germany	
Greece	
Hungary (MEHIB)	Access to the relevant documentation is required if necessary.
Hungary (Eximbank)	Access to the relevant documentation is required if necessary.
Italy	
Japan (JBIC)	
Japan (NEXI)	
Korea (Eximbank)	
Korea (K-sure)	
Luxembourg	
Mexico	
Netherlands	
New Zealand	
Norway	Where the applicant is not the exporter, GIEK will require an Exporters Corruption Declaration.

Section I: Measures to Deter Bribery

Question 2 (continued):

Please describe any additional measures taken in relation to exporter/applicant management control systems to combat bribery:	
Poland	
Portugal	In relation to the adoption of the OECD Recommendation and the new anti-bribery policy, a text on COSEC's website will be included very soon. A letter informing of the OECD Recommendation addressed to Banks and Exporters.
Slovak Republic	
Spain	
Sweden	
Switzerland	We are in the process of reviewing the possibilities of working with the Business Anti-Corruption Portal (www.business-anti-corruption.com). Cooperation with the Business Anti-Corruption Portal would provide us with a platform to place the appropriate information to enable us to efficiently encourage "appropriate management control systems that combat bribery".
Turkey	
United Kingdom	In addition, we inform customers about the OECD MEN guidelines (this encourages adoption of management control systems at section VI Para 5).
United States (EXIM)	
United States (USDA)	